[redacted]

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VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

September 18, 1996

Mr. Lance R. Richman, P.G.
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Diamond Alkali Superfund Site
Passaic River Study Area

Dear Mr. Richman:

This is in response to USEPA's request for information regarding the above-referenced site. PPG previously submitted a partial response to this request, a copy of which is attached hereto.

As a preliminary matter, PPG objects to the Agency's request for information to the extent that it seeks information or action which exceeds EPA's statutory authority. PPG also objects to the request to the extent it seeks information which is not relevant to the release of hazardous substances at the above-referenced site, or is a privileged communication.

Notwithstanding these objections, PPG has conducted a diligent search for information response to the questions contained in the request. Based upon that search, PPG's responses are attached hereto. These responses address conditions at the former PPG facility in Newark, New Jersey during the period that PPG operated at that location.

Please contact me if you have any questions.

Sincerely,

Joseph M. Karas
Assistant Counsel

Attachment

cc: Amelia Wagner, Esq.
T. J. Ebbert

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REQUEST FOR INFORMATION

Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 29 Riverside Avenue in Newark, New Jersey from 1920 through 1971 may have been discharged into the Passaic River.

Provide the information requested below, including copies of all available documentation that supports your answers.

1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?

PPG operated a paint manufacturing facility at 29 Riverside Avenue in Newark, NJ from approximately 1902 to 1971. PPG no longer operates at this facility.

2) Did your company receive, utilize, manufacture, discharge, release or dispose of any materials containing the following substances:

	YES	NO
2,3,7,8-tetrachlorodibenzo-p-dioxin or other dioxin compounds	_____	_____
2,4-dichlorophenoxyacetic acid	_____	_____
2,4,5-trichlorophenoxyacetic acid	_____	_____
Napthalene	_____	_____
Alkyd resins	_____	_____
Phenolic resins	_____	_____
Carbon disulfide	_____	_____
Chloroform	_____	_____
Cyanogen	_____	_____
Methyl Ethyl Ketone	_____	_____
Tetrachloroethane	_____	_____
Toluene	_____	_____
Xylene	_____	_____
Ethyl benzene	_____	_____
Trans-1,2-dichloroethene	_____	_____
Arsenic	_____	_____
Cadmium	_____	_____
Chromium	_____	_____
Copper	_____	_____
Lead	_____	_____
Mercury	_____	_____
Nickel	_____	_____

	YES	NO
Silver	_____	_____
Titanium	_____	_____
Zinc	_____	_____
Cyanide	_____	_____
PCBs	_____	_____
Basic Lead Carbonate (White Lead)	_____	_____

PPG manufactured paint, varnish, linseed oil, and resins at its Newark facility. Basic raw materials included natural gums and resins, flax seed, non-chlorinated solvents and pigments, though the chemical constituents of some of these materials changed over time. Relative to the chemicals listed above:

- *Alkyd resins were manufactured at the site. These products were used by PPG as raw materials in paint and varnish manufacture. Phenolic resins were not manufactured but would have been received at the site and used as raw materials in the manufacture of paints and varnishes.*

- *Toluene, xylene, ethylbenzene, and methyl ethyl ketone would have been received at the site and used as raw materials in the manufacture of paints and varnishes.*

- *Pigments would have been brought to the site and used in the manufacture of paints. These were often metallic chemicals and would have included compounds of cadmium, chromium, lead, titanium and zinc. Basic lead carbonate (white lead) would have been one of the pigments used as a raw material. Mercury was used, probably as a preservative in certain paints.*

- *Small amounts of flake naphthalene reportedly were used in lacquer production and small amounts of copper oxide reportedly were used in paint production.*

- *PCBs, dioxins, 2,4-dichlorophenoxyacetic acid, and 2,4,5-trichlorophenoxyacetic acid would not have been received, utilized, manufactured, discharged, released, or disposed of at the Newark site.*

- *PPG believes that carbon disulfide, chloroform, tetrachloroethane, trans-1,2-dichloroethene, arsenic, cyanogen or cyanide were likewise not present at the site, particularly since these chemicals are not normally associated with the types of operations conducted by PPG at the site.*

- *PPG has no information relative to nickel or silver, except to note that these metals are not commonly found in pigments.*

3) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (2), were a product or by-product. Include in your answer the identity and quantity of the raw materials combined in each process; the temperature, pH and pressure of each process; and any residues or by-products generated as a result of the process.

RESPONSE: *PPG manufactured paint, varnish, linseed oil, and resins at its Newark Paint Plant. Raw materials, consisting of resins, solvents, and pigments were mixed to produce paints. Varnishes were made from resins, oils, and solvents. Linseed oil was manufactured at this facility using flax seed as the principal raw material. Small amounts of caustic soda were used in processing the oil. Solvents from cleaning manufacturing equipment and off-spec products were recycled by reuse in the production process or reclaimed to recover solvents. Wastes from solvent recovery typically consisted of still sludge which was drummed and sent offsite for disposal. Finished products were shipped in tankwagons, drums or smaller containers. PPG has information about the identity of compounds that were used in the processes as indicated in response to question 2; however, information about the quantities, temperatures, pH and pressures, residues and by-products is not available.*

b) During what parts of the manufacturing processes identified in the response to item (3)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (2), generated?

An integral part of paint, varnish and resin manufacture involves the cleaning of equipment between batches. Either organic solvents or a caustic water solution was used as the cleaning agent. When the solvent was too dirty to continue to be used, it was recovered using a solvent still. Distillation residues consisting of solvent residues and pigments would have been waste and were drummed and sent offsite for disposal. There is no information as to the amount of hazardous substances generated.

i) Describe the chemical composition of these hazardous substances

Still sludge would have consisted or organic (nonchlorinated) solvents and pigments.

ii) For each process, what amount of hazardous substances was generated per volume of finished product?

PPG has no information responsive to this question.

iii) Were the hazardous substances combined with wastes from other processes? If so, wastes from what processes?

See response above.

4) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (2) and (3). Include information on the following:

a) How residues, by-products and off-spec products were disposed of.

Solvents used for equipment cleaning were often recycled as raw materials in making lower quality coatings as a cost effective substitute for virgin raw materials. Solvents were also recovered as described in the response to Question 3(b). Materials that could not be recycled were drummed and landfilled off-site. Off-spec products would have been recycled to make salable products or sent off-site for disposal. With respect to caustic wastes, see the response to number 6.

b) What processes were used to treat your waste? What was done with the waste after it was treated?

The plant had a solvent recovery system to reclaim dirty solvents. After solvents were reclaimed, they were reused. The residue was disposed of in drums off-site..

c) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

This plant closed 25 years ago. Throughout the facility's nearly seventy year operating history, a number of persons had responsibility for making arrangements for the disposal of wastes. PPG has been unable to locate any of these persons. Joseph Comeskey was the paint plant superintendent for a number of years prior to the closure of the facility, and would have had this responsibility just prior to the plant's closure in 1971. Mr. Comeskey died in 1990.

d) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

Containerized wastes were transported off-site by a private contractor, the identity of which is not relevant to this Request for Information.

5) Describe <u>all</u> storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

During its 70 year operating history, PPG's Newark facility used steel tanks, drums, barrels, pails, cans, bottles and bags to store materials used in the manufacturing process.

a) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.

Some drums were stored outside. At least some of these drums were stored on unpaved areas during a portion of the period that the plant operated. It is unknown whether the drums stored in this manner were empty or what they may have contained. One former employee recalled that empty barrels were stored outside.

Several of the largest buildings on the site were used for storage of drums of raw materials and finished products. PPG does not have sufficient information to determine whether such materials were stored outside at any time during which the plant operated.

b) When drums were stored outside, were empty drums segregated from full drums?

See response to 5a.

6. For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to items (2) and (3):

i) Was the waste stream discharged into a sanitary sewer and if so, during what years?

See response below.

ii) Was the waste stream treated before being discharged to the sanitary sewer and if so, how? Please be specific.

See response below.

iii) If the waste waters were not discharged to the sanitary sewer, where were it disposed of and during what years?

See response below

iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.

See response below.

PPG has insufficient information to answer this question. The plant was connected to a public sewer system which we believe existed when the facility was constructed in 1902. (See attached "Plumber's Specifications" from 1902 facility construction specifications) However, it is not clear whether anything besides sanitary waste, was discharged to these sewers. No detailed maps or records of analyses are available to PPG.

Tanks used in the production of certain products, e.g., water based paint, were rinsed with a dilute caustic water solution for cleaning after use. The rinse from this cleaning possibly was discharged to the sanitary sewers. In addition, a caustic cleaning tank was used to clean portable paint tanks. Periodically (1-2 months), the cleaning tank would be drained and its contents possibly were discharged to the sanitary sewers.

Caustic water solutions were also used in the production of the linseed oil. Linseed oil was produced at the Newark plant from 1923 until 1947. No informationwas found regarding the final disposition of the spent caustic water solution.

PPG is not aware of any information that any sewered materials were treated before discharge. No records of any analyses performed on the waste streams were found.

b) For floor drains or other disposal drains at the facility:

PPG does not have information indicating that floor drains existed in any of the buildings.

i) Did the drains connect to a sanitary sewer and if so, during what years?

See response above.

ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?

See response above.

iii) (i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?

PPG has no information that there are any catch basins or lagoons on the property. With regards to the storm sewers, refer to 8b.

a) If catch basins or lagoons existed, were they lined or un-lined?

Not applicable.

b) What was stored in the lagoons?

Not applicable.

c) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?

Not applicable.

iv) Please provide maps and/or diagrams of any waste water collection, transport or disposal systems on the property.

A 1959 revision of a 1942 drawing (copy attached) shows an 8-inch sewer line running from Building 17 southwest to the edge of the property. It apparently ties in to a city sewer line at that point, although this is not definitively stated on the drawing.

7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (2) or identified in the responses to item (3), above, provide the total amount generated during the operation of the facility on an annual basis.

PPG has no basis available on which to estimate quantities of hazardous substances generated by this facility. Based upon available information, PPG believes only a limited amount of production related waste, if any, was discharged to the sewers.

b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (2) or identified in the responses to item (3), above disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.

PPG has no information that hazardous substances were disposed of in the Passaic River or directly discharged to the Passaic River.

8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to items (2) or (3), were released on the property, into the waste water or storm drainage system at the facility or to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

There was a fire at the Resin Plant (Building #17) in 1969. PPG has no information that any hazardous substances were discharged into the storm drainage system or to the Passaic River.

a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.

PPG has no information about any sampling of soil, water, air or other media following this incident.

b) EPA has information that there were two "36" pipes at your facility that discharged directly into the Passaic River. Please describe in detail how these outfalls were utilized, including, but not limited to, whether storm water, process waste water, or any other material was ever discharged through these outfalls. Provide any maps or diagrams showing the location of these outfalls.

PPG requests that EPA provide this information to PPG in response to our FOIA Request of July 22, 1996. These outfalls may be regional storm sewers that originate off of the former PPG site and pass through a right of way. PPG has no information about tie-ins to the storm sewers on the PPG site

c) EPA has information that 4" to 6" pipes ran from each individual building on your facility directly to the Passaic River. Please describe in detail how these outfalls were utilized, including but not limited to, whether storm water, process waste water, or any other material was ever discharged through these outfalls. Provide any maps or diagrams showing the location of these outfalls.

PPG has no information which identifies or locates these pipes We request that EPA provide us with the information it has on this subject in response to PPG's FOIA request of July 22, 1996.

d) EPA has information that a 100,000 gallon concrete underground tank was located at your facility beneath building #7 adjacent to the Passaic River. Please provide all information concerning this tank, including but not limited to, what was stored in this tank, whether this tank was checked for leaks and when, if ever, this tank was removed. Provide any maps or diagrams showing the location of this tank.

In response to a FOIA request, PPG obtained from USEPA, Region 2, an October, 1992 report by the New Jersey Department of Environmental Protection and Energy that describes such a tank However, former employees contacted did not recall its existence, and the drawings available do not identify such a tank. It is possible that the referenced structure was converted into a tank by a site operator subsequent to PPG's ownership of the site.

e) Please provide information relating to an explosion and fire which occurred at your facility on or about May 26, 1969. Please describe this incident and provide any and all documents relating to the incident and clean-up, if any, or subsequent preventive measures taken.

According to a PPG employee, a vapor cloud was released from one of the resin reactors in Building 17. This vapor cloud migrated through the building until an ignition source was found. The resulting explosion blew out sections of the walls and roof and ignited resin which had leaked out of one of the vessels. The burning resin spread throughout the building. Several other storage tanks and processing tanks failed during the fire, releasing their contents into the building. A tank truck which was being filled also caught fire and burned. Newark City firefighters pumped water from the river into the building and nearby storage tanks to attempt to contain the fire.

The building was damaged beyond repair during the fire and was later demolished.

PPG has no information indicating that hazardous substances were released into the Passaic River during this event.

9) Describe the use of the dock located on the Passaic River at your facility, including but not limited to, the time period it was used, the identity and volume of material received, how the material was transported into your facility and whether any spills or accidents occurred during the handling of these materials at the dock.

The dock was used in the first half of the century to unload flax seed and coal for use in the factory and to ship final products. Based on discussions with former employees, the dock was not used after 1946.

10) a) Was your facility ever subject to flooding. If so, was the flooding due to:

i) overflow from sanitary or storm sewer back-up, and/or

ii) flood overflow from the Passaic River?

Flooding from the Passaic river occurred at least once at the Newark plant in the 1960's. This flooding apparently did not cause significant damage to the facility. Based on discussions with former employees, this flood was the only one remembered.

b) Please provide the date and duration of each flood event.

The date and duration of the flood in the 1960's is not known.

11) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

PPG has no record of any such proceedings related to this plant.

12) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (2) or (3). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.) Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

PPG submitted a survey form covering this property to Congressman Eckhardt's subcommittee in 1979. A copy of the completed Eckhardt survey for this plant is attached. It has been redacted to eliminate the identity of the company that hauled waste off-site, since that information is not relevant to this Request for Information.

13) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?

b) If so, please provide all other documents pertaining to the results of these analyses.

PPG has no information about any sampling of soil, water, air or other media, other than information that was provided to PPG by USEPA as part of a FOIA request related to another Superfund site. That information is contained in a 1992 report prepared by NJDEPE relative to the Frey Industries facility, which apparently occupies part of the former PPG site

14) and 15) *See PPG's partial response for this Site dated August 15, 1996, a copy of which is attached.*

16) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

Joseph Karas:	*Assistant Counsel* *PPG Industries Inc., One PPG Place,, Pittsburgh, PA 15272* *412-434-241; No personal knowledge*
Thomas Ebbert:	*Environmental Engineering Associate* *PPG Industries, Inc., 4325 Rosanna Drive, Allison Park, PA 15101* *412-492-5478; No personal knowledge*
Greg Norman:	*Process Technician* *PPG Industries, Inc., 151 Colfax Street, Springdale, PA 15144* *412-274-3454; No personal knowledge*
Bill Silvestri:	*PPG's Cleveland Manager, Ohio facility; 216-671-0050* *Questions 6,8 & 10;*
Tom Price	*PPG's C&R Engineering Office, Allison Park, PA; 412-492-5477* *Question 8;*
Pat Racioppi	*Retired: Florida;* *Question 5, 6, 8 & 10*
Tom Risch	*Retired: Pittsburgh, PA; 412-487-6219* *Questions 2,5,6,8 &10.*

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